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PETER OPPEHEER  
CLERK US DIST COURT  
WB OF WI

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. **20 CR 081 WMC**

AHMAD KANAN, aka  
AHMED KANAAN,

Defendant.

18 U.S.C. § 1343  
18 U.S.C. § 2  
18 U.S.C. § 1956  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 982  
18 U.S.C. § 2461(c)

THE GRAND JURY CHARGES:

COUNT 1

1. At times material to this indictment:

a. Defendant AHMAD KANAN, aka AHMED KANAAN, was the Chief Executive Officer and 100% owner of Altin Labs, Inc.

b. The Coronavirus Aid, Relief, and Economic Security (CARES) Act, a federal law enacted on March 27, 2020, was designed to provide emergency financial assistance to the millions of Americans suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses for job retention and certain other expenses through the Paycheck Protection Program (PPP).

c. The PPP allowed qualifying small businesses and other organizations to receive unsecured Small Business Administration (SBA)-guaranteed loans. The PPP was overseen by the SBA, which had authority over all PPP loans, but

individual PPP loans were issued by approved commercial lenders who received and processed PPP applications and supporting documentation.

d. On October 10, 2019, the defendant was indicted by a federal grand jury in the Western District of Wisconsin on charges of access device fraud and attempted access device fraud. Defendant appeared for his arraignment on October 11, 2019. At the arraignment, defendant was advised in open court that he had been indicted and the nature of the charges pending against him.

2. From on or about July 23, 2019, to on or about June 11, 2020, in the Western District of Wisconsin and elsewhere, the defendant,

AHMAD KANAN,  
aka  
AHMED KANAAN,

knowingly, and with intent to defraud, devised and intended to devise a scheme to defraud, and to obtain money by means of materially false and fraudulent pretenses, representations, promises, and by concealment of material facts.

3. It was part of the scheme to defraud that defendant, acting on behalf of Altin Labs, Inc., applied for and in some cases, obtained, loan and investment-related funds using a variety of false misrepresentations and by concealing certain material facts.

4. It was further part of the scheme to defraud that, on or about April 15, 2020, acting on behalf of Altin Labs, Inc., defendant applied for a \$72,500 PPP loan through the Bank of Kaukauna, a financial institution authorized to issue PPP loans, located in Kaukauna, Wisconsin.

5. It was further part of the scheme to defraud that the defendant applied for the PPP loan with the Bank of Kaukauna using a false spelling of his name, Ahmed Kanaan.

6. It was further part of the scheme to defraud that when asked, on the Bank of Kaukauna PPP loan application, whether he, the applicant, was subject to "an indictment, criminal information, arraignment, or other means by which formal criminal charges are brought in any jurisdiction, or presently incarcerated, or on probation or parole," the defendant falsely answered, "no."

7. It was further part of the scheme to defraud that on or about May 6, 2020, acting on behalf of Altin Labs, Inc., defendant applied for and received a \$47,060 PPP loan through Cross River Bank, a financial institution authorized to issue PPP loans, located in New Jersey. These funds were deposited into Altin Lab, Inc.'s JP Morgan Chase Account ending in 7182.

8. It was further part of the scheme to defraud that when asked, on the Cross River Bank PPP loan application, whether he, the applicant, was subject to "an indictment, criminal information, arraignment, or other means by which formal criminal charges are brought in any jurisdiction, or presently incarcerated, or on probation or parole," the defendant falsely answered, "no."

Wire

9. On or about May 1, 2020, in the Western District of Wisconsin and elsewhere, the defendant,

AHMAD KANAN,  
aka  
AHMED KANAAN,

for the purpose of executing this scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce, signals and sounds, that is an email containing loan-related documents, sent at the defendant's request, from defendant's representative in Madison, Wisconsin through a server in Ohio to a Bank of Kaukauna employee.

(All in violation of Title 18, United States Code, Sections 1343 & 2)

COUNT 2

1. Paragraphs 1-9 of Count 1 are incorporated here.
2. On or about May 8, 2020, in the Western District of Wisconsin, and elsewhere, the defendant,

AHMAD KANAN,  
aka  
AHMED KANAAN,

knowingly conducted a financial transaction affecting interstate commerce, namely the transfer of \$47,000 from Altin Labs, Inc.'s JP Morgan Chase Account ending in 7182 to his Wells Fargo Checking Account ending in 8015, which involved the proceeds of a specified unlawful activity, that is the wire fraud scheme described in Count 1 in violation of Title 18, United States Code, Section 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, ownership, control, and source of the proceeds of the specified unlawful activity and that while conducting

the financial transaction he knew that the funds involved in the financial transaction represented the proceeds of some form of unlawful activity.

(In violation of Title 18, United States Code, Section 1956)

FORFEITURE ALLEGATION

1. The allegations contained COUNT 1, paragraphs 1-7 of this information, are re-alleged here for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982 and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in COUNT 1, the defendant, AHMAD KANAN, aka AHMED KANAAN, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982, and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the scheme to defraud described above. The property to be forfeited includes, but is not limited to, the following:

- a. Money Judgment - a sum of money equal to \$147,060.00 in United States currency, representing the amount of proceeds obtained as a result of the scheme to defraud;
- b. up to \$74,960.86 previously seized from Mercury account 7107; and
- c. up to \$8,158.74 previously seized from Wells Fargo Savings account 7135.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;


- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
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PRESIDING JUROR

Indictment returned: 07/08/2020

  
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SCOTT C. BLADER  
United States Attorney